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Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 112th Street, SW
Washington, DC 20554

**RE: WC Docket No. 14-58
2015 ETC Annual Report of North State Telephone Company d.b.a. North State
Communications (Study Area Code 230491)
Request for Confidentiality**

Dear Secretary Dortch:

North State Telephone Company d.b.a. North State Communications ("North State" or "Company") hereby requests, pursuant to 47 C.F.R. 0.457 and 47 C.F.R. 0.459 of the Commission's rules, withholding from public inspection information contained in the Company's Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") as required by 47 C.F.R. 54.313(a)(1). In accordance with subparagraphs (1) through (9) of Section 0.459(b), the following is a statement of the reasons for withholding this document from public inspection.

1. North State seeks confidential treatment of the Company's Progress Report which is provided as part of its 2015 ETC Annual Report. The Progress Report contains a narrative and three exhibits: a list of Company service quality improvement projects; projected capital and operating expenditures; and a service area map depicting certain network capabilities.
2. 47 C.F.R. 54.313(a)(1) requires Rate-of-Return Eligible Telecommunications Carriers (ETCs) to file with the Commission as part of the ETC Annual Report a Progress Report on its Five-Year Service Quality Improvement Plan. The Progress Report is contained in an attachment to Line 112 of the 2015 Annual Report (FCC Form 481).
3. All information contained in the Progress Report pertains to the Company's current and future plans for provisioning telecommunications services, including proposed network maintenance and upgrades and projected capital and operating expenditures associated with these projects. As such, this information is of a confidential commercial and financial nature and is customarily withheld from public inspection.
4. North State provisions voice and broadband services in a highly competitive market, therefore, the information contained in the Progress Report concerns services that are subject to competition.

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5. Disclosure of the proprietary information contained in the Progress Report could result in substantial competitive harm to North State if not protected. The Progress Report could reveal the locations of North State customers as well as areas targeted for network improvement projects. Competitors could potentially use this information to target North State customers or target specific areas of North State's service territory, thus placing the Company at a competitive disadvantage.
6. North State follows standard security protocol to prevent unauthorized disclosure of the information contained in the Progress Report. Only senior management, directors, or employees with a direct need to know are authorized to access the information. North State is filing the Progress Report under seal and is following the Commission's rules as set forth in 47 C.F.R. 0.457 and 47 C.F.R. 0.459 to ensure the information is withheld from public inspection.
7. The information contained in the Progress Report is not available to the public, nor has there been any prior disclosure of such information to third parties.
8. The information contained in the Progress Report has not and will not be disclosed to the public by North State. Therefore, the Company expresses its need for maintaining permanent confidentiality of this information.
9. No additional information is available that may be useful in assessing whether the Company's request for confidentiality should be granted.

Please contact me if you have any questions regarding this filing.

Sincerely,



Andrew Stevenson
Analyst - External Affairs